<u>REMARKS</u>

The present application was filed on September 27, 1999 with claims 1-15. Claims 1-15 have been canceled. Claims 16-32 have been added and remain pending. Claims 16, 31 and 32 are the pending independent claims

In the outstanding Office Action dated April 9, 2003, the Examiner: (i) rejected claims 1 and 5-10 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,535,896 to Britton et al. (hereinafter "Britton"); (ii) rejected claim 2 under 35 U.S.C. §103(a) as being unpatentable over Britton in view of U.S. Patent No. 6,438,543 to Kazi et al. (hereinafter "Kazi") and further in view of U.S. Patent No. 6,182,029 to Friedman (hereinafter "Friedman"); (iii) rejected claims 3 and 4 under 35 U.S.C. §103(a) as being patentable over Britton in view of U.S. Patent No. 6,463,440 to Hind et al. (hereinafter "Hind"); and (iv) rejected claims 11-15 under U.S.C. §103(a) as being unpatentable over Britton in view of Kazi further in view of Friedman and further in view of Hind.

In response, Applicants: (i) file concurrent herewith a Request for a Continued Prosecution Application (CPA); (ii) cancel claims 1-15; and (iii) present new claims 16-32 for consideration.

Accordingly, the rejection of claims 1-15 is considered moot in view of the cancellation of claims 1-15 and, therefore, it is respectfully requested that the §103(a) rejections be withdrawn.

Regarding new claims 16-32, Applicants respectfully assert that Britton, Kazi, Friedman, and Hind fail to disclose all of the claim limitations of said claims.

By way of example, the references fail to disclose the concept of identifying text instances in the data using a text processing module, and the finding of images in an image database module that relate to the text instances. Further, the references fail to disclose the generation of a dynamic representation of the data from the image and the data. Each of these elements is expressly recited in claims 16, 31 and 32.

Britton mentions tailoring HTML content for display. However, the HTML content is converted to XML format and modified using an XML content tailoring tool. The XML content is then combined with unmodified content and transmitted for display on a pervasive computing device. Thus Britton does not disclose the identification of text, the finding of images relating to the identified text and the combination of an XML file with an XSL style sheet to produce an HTML

file representing a dynamic visualization of the original data, as in independent claims 16, 31 and 32. Kazi, Friedman and Hind considered singly or in combination also fail to disclose these elements.
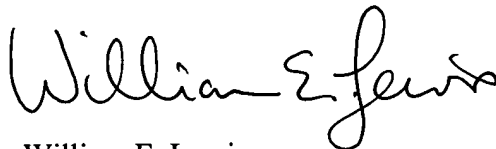
For at least the above reasons, Applicants submit that independent claims 16, 31 and 32 are patentable over the cited reference. In addition, Applicants submit that claims 17-30 are patentable over the cited reference not only due to their respective dependence on claims 16, 31 and 32 but also because such claims recite patentable subject matter in their own right.

Applicants file concurrent herewith a Request for a Continued Prosecution Application (CPA). Applicants point out that the CPA status of this application precludes the use of Britton, Kazi and Hind as references under 35 U.S.C. §103(c).

Attached hereto is a marked-up version of the changes made to the claims by the present Amendment. The attached pages are captioned "Versions with Markings to Show Changes Made."

In view of the above, Applicants believe that claims 16-32 are in condition for allowance, and respectfully request favorable consideration.

Respectfully submitted,

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Date: July 11, 2003

<u>VERSION WITH MARKINGS TO SHOW CHANGES MADE</u>

<u>IN THE CLAIMS</u>

Claims 1-15 have been canceled.

New claims 16-32 have been added as follows:

--16. (New) A method of creating a dynamic representation from data received from an information source, comprising the steps of:

storing the data received from the information source;

identifying at least one text instance in the data using a text processing module;

finding an image in an image database module relating to the at least one text instance; and

generating the dynamic representation of the data from the image and the data.

17. (New) The method of claim 1, wherein the generating step further comprises:

transforming the data and image into an Extensible Markup Language (XML) object saved to an XML file in a storage disk;

creating at least one Extensible Stylesheet Language XSL style sheet in a storage disk; and

combining an XSL style sheet with the XML file to produce a Hypertext Markup Language (HTML) file representing a dynamic representation of the data.

18. (New) The method of claim 16, wherein the data comprises an article title and body.

19. (New) The method of claim 16, wherein the data comprises an HTML document.

20. (New) The method of claim 16, wherein the data comprises a digital news feed.

21. (New) The method of claim 16, wherein the step of identifying at least one text instance comprises identifying an offset and a length of each text instance occurrence.

22. (New) The method of claim 16, wherein the step of storing data comprises receiving data as a compressed collection of files via a file transfer protocol.

23. (New) The method of claim 16, wherein the step of identifying at least one text instance comprises identifying proper names in the data.

24. (New) The method of claim 16, wherein the step of identifying at least one text instance comprises providing a canonical form and a category of each text instance.

25. (New) The method of claim 16, wherein the step of identifying the at least one text instance comprises the steps of:

translating identifying information into an XML text buffer, wherein each text instance is converted into tagged elements in the data; and

creating a document object from the XML text buffer, wherein the object comprises the data and the at least one text instance.

26. (New) The method of claim 16, wherein the step of finding images comprises the steps of:

sending a query in the form of a Uniform Resource Locator (URL) string to the image database module; and

generating a list of elements matching the query in the image database module, wherein each element comprises a URL to an image file stored in the file system.

27. (New) The method of claim 17, further comprising the step of combining paragraphs of the data into sections, wherein each section defines a state in the dynamic representation, and wherein each section comprises at least one paragraph and a single image corresponding to a text instance.

28. (New) The method of claim 16, further comprising the step of selecting images from the found images to display with the data, comprising the steps of:

identifying the number of unique text instances with associated images in the data;

comparing the number of unique text instances with a minimum number and terminating the method if the number of unique text instances is less than the minimum number;

storing the number of unique text instances in a temporary structure;

ranking the unique text instances by their frequency in the data;

processing paragraphs of the data beginning with the paragraph having the most unique text instances;

indicating in the document object that an image corresponding to the most frequent unique text instance in a paragraph will be displayed in the dynamic representation of the paragraph; and

grouping paragraphs into sections, wherein two consecutive paragraphs are grouped together if one paragraph has a unique text instance and an image link so that each section has a unique text instance and an image to display.

29. (New) The method of claim 17, wherein, in the step of transforming the data and images, the XML file comprises elements needed by an XSL style sheet to construct HTML into a dynamic representation.

30. (New) The method of claim 17, wherein each XSL style sheet represents a different layout.

31. (New) An apparatus for creating a dynamic representation from data received from an information source, the apparatus comprising:

a memory; and

at least one processor coupled to the memory and operative to: (i) store the data received from the information source in a file system; (ii) identify at least one text instance using a text processing module; (iii) find an image in an image database module relating to the at least one text

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instance; and (iv) generate the dynamic representation of the data from the image and the data.

32. (New) An article of manufacture for creating a dynamic representation from data received from an information source, comprising a machine readable medium containing one or more programs which when executed implement the steps of:

storing the data received from the information source in a file system;

identifying at least one text instance in the data using a text processing module;

finding image in an image database module relating to the at least one text instance; and

generating a dynamic representation of the data from the image and the data.--